

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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November 20, 2003

T.R.A. DOCKET ROOM

IN RE: Promotion to Introduce BellSouth)
Integrated Solution's Tariff No. 2003-956) *Docket No. 03-00512*
)
)

**PETITION OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, LLC TO CONVENE CONTESTED CASE AND TO INTERVENE**

AT&T Communications of the South Central States, LLC ("AT&T") joins the Consumer Advocate Division of the Office of the Attorney General in asking that the above-captioned tariff be suspended and a contested case proceeding opened. AT&T also asks to intervene in that proceeding.

This matter is before the agency upon the filing of a tariff by BellSouth Telecommunications, Inc. ("BellSouth") to offer a service known as BellSouth Integrated Solutions ("BIS"). BIS offers customers a bundle of regulated and unregulated services at a single monthly rate. BellSouth claims that, because this tariff includes unregulated offerings, this service bundle is not subject to the resale requirements of the federal Telecommunications Act.

AT&T agrees with the Consumer Advocate Division that BellSouth's argument could allow the carrier to circumvent its resale obligations by bundling all regulated services with immaterial, unregulated products and selling the bundled, regulated services at substantially less than the tariffed rates for the regulated services standing alone. The

anti-competitive dangers of this proposal are obvious and should be fully considered in a contested case proceeding in which AT&T would participate as a party.

As a competing local exchange carrier in Tennessee, AT&T's legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the Authority's decision on this tariff. Allowing AT&T to intervene will not impair the orderly and prompt conduct of these proceedings.

AT&T therefore supports the position of the Consumer Advocate regarding this tariff and, if the Authority decides to open a contested case, seeks to intervene in that proceeding.

Respectfully submitted this 20th day of November, 2003.


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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

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